

**U.S. BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: LEON D. CHAMBERS

: CHAPTER 13

Debtor

: NO. 19-14923-MDC

MOTION TO MODIFY CHAPTER 13 PLAN POST-CONFIRMATION

Debtor, Leon D. Chambers, by and through his undersigned attorney, hereby moves this Honorable Court for an Order to Modify his Chapter 13 Plan post-confirmation, pursuant to 11 U.S.C. 522 § 1329, as fully set forth below, and in support thereof respectfully avers as follows:

1. Debtor commenced this case on August 5, 2019, by filing a Voluntary Chapter 13 Petition.
2. This Court has jurisdiction over this Motion, filed pursuant to 11 U.S.C. § 522 (f), pursuant to 28 U.S.C. §1334.
3. On June 4, 2020, court entered an order confirming Debtor's Chapter 13 Plan.
4. On May 25, 2022, attorneys for PNC Bank filed a Notice of Post-Petition fees and costs in the amount of \$1,038.00 after withdrawing a Motion for Relief from the Automatic Stay.
5. Debtor proposes payments of \$1,185.00 per month for the remaining 43 months of the Chapter 13 Plan, beginning March 2023.

WHEREFORE, Debtor requests that this Honorable Court enter an Order allowing Debtor to modify her chapter 13 plan post-confirmation, and for such additional relief as may be deemed just and proper.

Respectfully submitted,

Date: February 27, 2023

/s/ Akeem J. Parsons

Akeem J. Parsons, Esquire

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